

## EXHIBIT 15

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EXHIBIT 15

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# Google™

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7/17/2008



## Web Search Help Center

### Search Basics:

#### How do I use Google Web Search?

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Using Google can be as easy as typing a word or phrase into the Google search box and clicking either the "Google Search" or "I'm Feeling Lucky" button. To make the most of your Google search, here are a few tips for choosing search terms that will return the most relevant results:

- **Use keywords to search.** You'll find the most accurate results by typing words or short phrases—rather than full sentences and questions—into the search box.

Example: If your question is "Can I take my dog with me on my trip to London?" good search terms might be:

- [ dog travel london ]
- [ dog airline london ]
- [ pet flying ]

- **Choose keywords carefully.** The best search terms are descriptive and specific. Enclosing a few or all of your keywords in quotation marks can help you locate webpages that contain an exact phrase, such as a person's full name, a book title, or song lyrics.

Example: If you're in need of a recipe for cake with a very specific type of frosting, you might perform the following search:

- [ recipe cake "toasted coconut frosting"]

- **Experiment.** If your initial search results aren't quite what you're looking for, you can change, delete,

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or add keywords in the search box  
at the top of the search results  
page or click on the "Search within  
results" link at the bottom of the  
page.

For more tips on refining your search  
technique, please visit our [Basics of  
Search](#) and [Advanced Search](#) guides.

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# Google™ Web Search Help Center

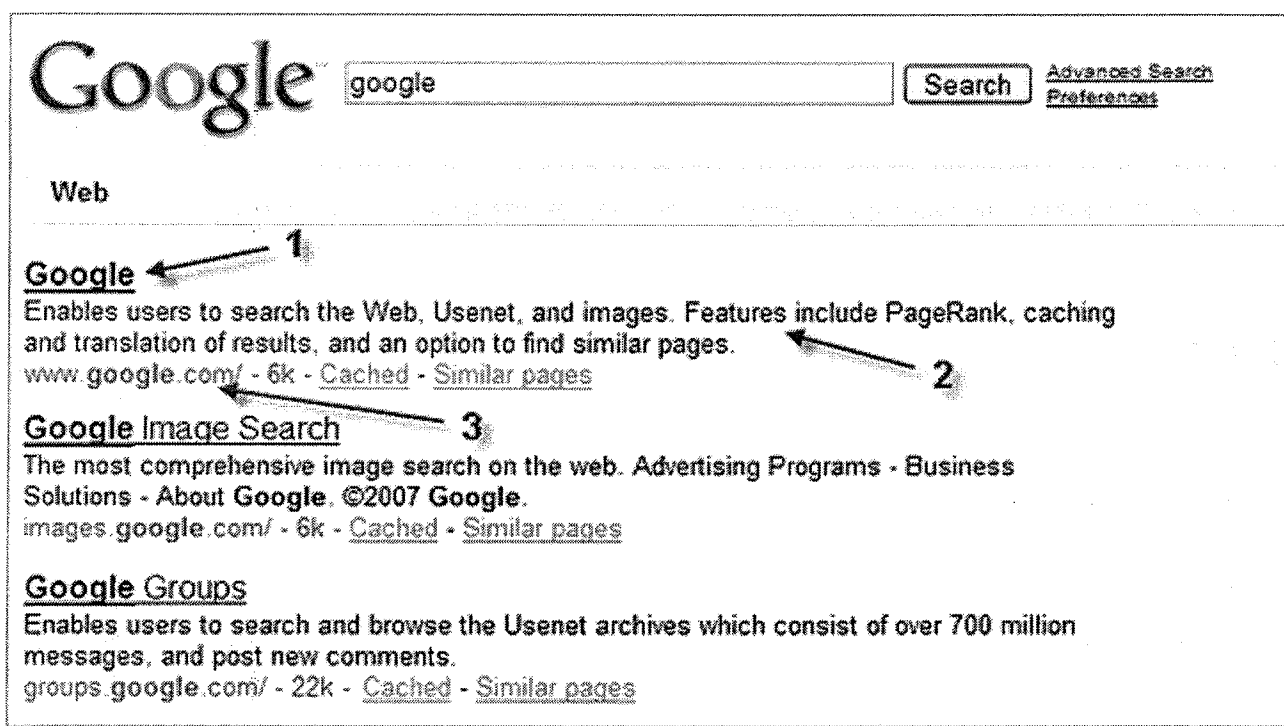
## Search Basics:

### How do I interpret Google's search results?

3 of 5



Google's goal is to provide you with results that are clear and easy to read. The diagram below points out three features that are important to understanding your search results:



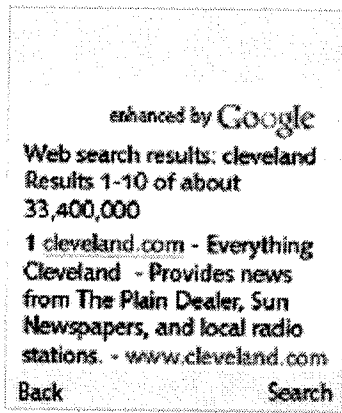
1. The title: The first line of any search result is the title of the webpage.
2. The snippet: A description of or excerpt from the webpage.
3. The URL: The webpage's address.

More details about our search results can be found in our [Search Guides](#).

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Google logo (see Attribution section)  
title + number of documents

#### 1.4 Google Search Results

##### Google Search Results (Figure 6)

You may integrate the results into your site as you see fit, but Google requires that the content, ordering, and display of the results remain unchanged to ensure the highest quality user experience. You must include the following elements:

**Figure 6:** Search Result Elements

title	<u>1 cleveland.com - Everything Cleveland</u> - Provides news
snippet	from The Plain Dealer, Sun Newspapers, and local radio stations. - www.cleveland.com/
URL	

The elements of a search result that must be included:

- Result Title – The title includes descriptive text, and serves as a hyperlink to the site.
- Snippet\* - This is a dynamically generated selection of text from the relevant web site. The snippet helps customers decide if that particular result will answer their question before visiting the page.
- Search Result URL\* - This is the address of the result site and the site to which the result title hyperlinks.

**\*Note:** Any changes to the length of the snippet or search result URL must be approved by Google.

If Google Search results appear in conjunction with other content, such as operator content and/or sponsored listings, a visual separation must be made between search results and the other content sections (Figure 7).

The layout should clearly distinguish unedited Google search results from paid sponsorships and/or operator content. In addition to the mandatory heading for the Google Search section (see 1.3 Results Header section), there are several ways in which this can be implemented:

- Lines, bars or other borders clearly separating labeled search results from labeled sponsored listings or other content results.
- Colored background behind labeled sponsored listings or other content results.

**Figure 7:** Results separation

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## AdWords Help Center

Google Help > AdWords Help > About AdWords > Interested in AdWords

Change Language: English (US)

### Where will my ads appear?

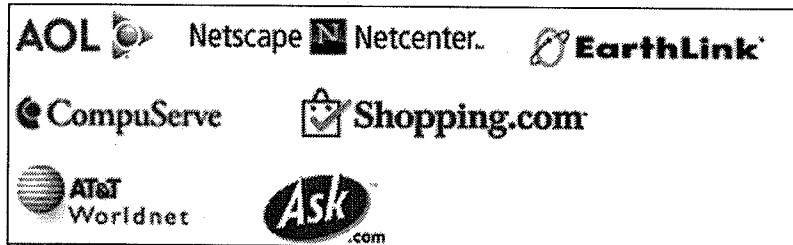
#### Ads with keywords

Ads from ad groups with keywords can appear on Google and the Google Network:

- Google search results pages: Alongside or above the search results.
- The Google Network: Search and content websites, plus other products and blogs. The Google Network is the largest advertising network available online, reaching over 86% of Internet users worldwide. You can be certain that your ads reach your target audience with Google AdWords.

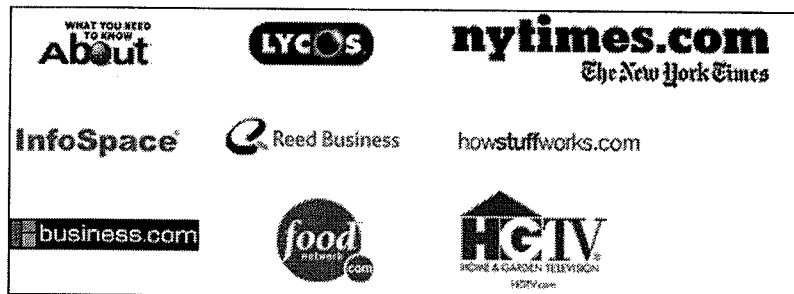
#### The search network

Your ads may appear alongside or above search results, as part of a results page as a user navigates through a site's directory, or on other relevant search pages. Our global search network includes Google Product Search and Google Groups and the following entities:



#### The content network partners

Our extensive content network of websites and products includes these partners:



#### Ads on the content network

AdWords ads on content sites are targeted to the content and URL of each page. In the screenshot below you can see how the ads are displayed on a content page and that the ads are directly relevant to the content of the page.

#### Search AdWords Help Center

examples: *content network* or *daily budget*

Search AdWords Help Center

#### Top 5 Questions

1. [How much does AdWords Starter Edition cost?](#)
2. [What should I know about the Keyword Tool's search volume statistics?](#)
3. [How do the Starter Edition and Standard Edition compare?](#)
4. [How does Google Analytics help me?](#)
5. [Now that my Starter Edition ad is running, what essentials should I know?](#)

#### Look Up Terminology

[Glossary](#)

#### Learn from other AdWords users

[AdWords Help discussion group.](#)

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## Web Search Help Center

### Policies and Principles: Advertising vs. search results

#### Overview

Google's search results represent our best estimate of the most relevant web pages on the internet for a given search query. We don't accept payment for inclusion in our search results, nor do we accept payment for improvement of a site's ranking.

Sponsored links, in contrast, are targeted, relevant advertising adjacent to our search results. When we show ads, we clearly label them with the heading "Sponsored Links," and we distinguish them visually from our search results.

#### Search Results

Search results constitute the main portion of a Google results page and are clearly distinguished from sponsored links. Search results are generated using algorithms that weigh numerous factors about the quality of a given web page and its relevance to a user's search query. Google doesn't accept payment either to include sites in our search results or to improve or alter the ranking of sites in our search results.

While we try to be as open as possible with regard to our ranking algorithms, we're unable to discuss every factor that goes into them because individuals could then unfairly exploit this knowledge to boost the ranking of their sites and dilute search quality for all of our users.

#### Sponsored Links

Sponsored links are sites that pay for placement on the same page as Google's search results and on the pages of the other sites that comprise our advertising network. These advertisements may sometimes appear adjacent to our search results and are always clearly labeled as "Sponsored Links." Sponsored links are targeted to a user's search and are thus extremely relevant; many users find that sponsored links often lead them to websites that contain the information for which they were searching.

Users who want to search across all available Sponsored Links' ads on Google.com can click **More Sponsored Links** beneath the ad listings on the right side of the search results page. The Ad Search feature will then load a

### Boost Your Web Search Vocabulary

Our glossary will help get you started with Google Web Search terminology.

### Additional Resources

- [Intro to Google Web Search](#)
- [Web Search Glossary](#)
- [Search Guides](#)
- [Webpage Removal Request Tool](#)

### Recommended Articles

1. [Googlebombs](#)
2. [Spam emails mentioning Google](#)
3. ['We're Sorry' page for networks](#)
4. [Google and censorship](#)
5. [Image use permissions](#)

### Learn from other Google users

Find answers, ask questions, and share your expertise with others in the [Web Search Help Group](#).

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page showing all ads in our network that match the user's search query.

More information about sponsored links and our advertising policies can be found in our [Google AdWords Help Center](#).

#### **How Our Search Engine Works**

The process by which we find content to include in our search index is known as "crawling." Google is a fully automated search engine that uses computer programs known as "spiders" to "crawl" the web and find sites for inclusion in our search index. Unlike online directories, we don't use human editors and thus it's not necessary to submit your site to Google in order to be included in our index. In fact, the vast majority of sites listed aren't manually submitted for inclusion.

The method by which we find pages and rank them in our search results includes dozens of factors, such as the PageRank algorithm originally developed by our founders, Larry Page and Sergey Brin. To learn more about how Google works and about search engines in general, please visit the [Google Help Center](#).

We've also published numerous academic papers that discuss search engine technology, such as [The Anatomy of a Search Engine](#) and [PageRank Citation Ranking](#). These research papers, and dozens more, are available at <http://labs.google.com/papers/index.html> and <http://labs.google.com/papers.html>.

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## Welcome to Google Product Search

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### Overview

[How it works](#)

[Ways to submit your products](#)

[Success stories](#)

[Related Google products](#)

## Increase traffic to your store with Google Product Search – for free

Google Product Search helps shoppers find and buy products across the web. As a seller, you can submit your products to Google Product Search, allowing shoppers to quickly and easily find your site.

**Add products to Product Search:**

**Start a data feed**

Or [post a single item](#)

Already a seller? [Sign into Google Base](#)



### Increase traffic and sales

Product Search connects your products to the shoppers searching for them, helping you drive traffic and sales to your store. Your products will appear on Google Product Search and may even be displayed on Google.com, depending on your items' relevance.



### Submit products for free

Inclusion of your products is completely free. There are no charges for uploading your items or the additional traffic you receive.



### Reach qualified shoppers

Reach shoppers precisely when they are searching for items to buy on Google.

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## How Google Product Search Works

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[Overview](#)

**How it works**

[Ways to submit your products](#)

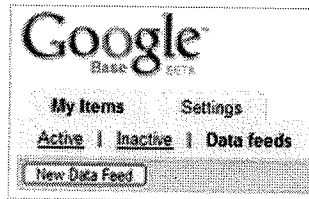
[Success stories](#)

[Related Google products](#)

**Add products to Product Search:**

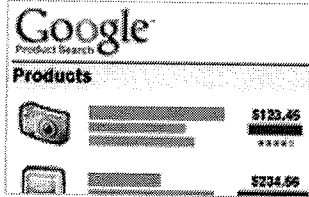
[Start a data feed](#)

[Post a single item](#)



### 1. Upload your products using our content submission tool

You can upload your products either one at a time or with a data feed. You'll be taken to Google Base, our content submission tool, to submit your product information.



### 2. Users find you on Google Product Search

Your products will appear on Google Product Search and may be displayed on Google.com. Your store and products will be shown to shoppers when they type in search terms relevant to your product offerings. Shoppers simply click on your listing to be brought to your site.

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## Google Book Search Help Center

[Help Center](#) > [About Google Book Search](#) > [Glossary](#)

Change Language:  
English (US)

### Froogle

A Google service that makes it easy to find information about products for sale online. By focusing entirely on products, Google Product Search applies the power of Google's search technology to a very specific task: locating stores that sell the item that a user is looking for and pointing them directly to the place where they can make a purchase.

#### You may also be interested in...

[Book Visits \(BV\)](#)

[Buy Link CTR](#)

[BV with Buy Clicks](#)

Don't see the answer to your question? [Contact us](#) to get help.

#### Search Help Center

#### Book Search Resources



[Google Books Partner Home](#)


[About Google Book Search](#)

[Best Practices](#)

[Success Stories](#)

[Program Policies](#)

[Glossary](#)

 [Chat now with a Book Search Specialist](#)

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## Learning Center

[Learning Center Help](#) - [AdWords Help](#)

[Print this lesson](#)

### [Lessons Catalog](#)

#### Lesson 1c: Pricing and Ranking

##### [Paying for AdWords](#)

- [How Much It Costs](#)
- [Daily Budget](#)
- [CPC and CPM Bids](#)
- [Quality Score and Minimum Bid](#)
- [Quiz](#)

##### [Ad Ranking](#)

- [How are ads ranked?](#)
- [Quiz](#)

#### [Paying for AdWords](#)

[« Previous Topic](#)

[Next Topic »](#)

Objective: Learn how much AdWords costs. Understand how your daily budget, CPC or CPM bid, and Quality Score influence the amount you'll pay.

#### [How Much It Costs](#)

[Back to Top](#)

AdWords doesn't have a minimum spending requirement — just a nominal, one-time activation fee. You set your spending limits, depending on your advertising goals. In addition, you pay only for clicks or impressions that your ad receives. You control your costs through:

- Your daily budget
- Your CPC and CPM bids
- Your Quality Score

#### [Daily Budget](#)

[Back to Top](#)

Your daily budget is the amount you're willing to spend on a specific campaign each day. We'll show ads within a campaign as often as possible to meet your daily budget.

To help you set a daily budget that maximizes your ad's visibility, AdWords provides daily budget recommendations within your account. These recommendations are based on historical click data for the same or similar keywords that you choose for your ads, among other factors.

If your daily budget is lower than the AdWords recommended amount, your ads may not show all the time. Should this happen, we'll display your ads intermittently throughout the day so they won't stop showing altogether (per [standard delivery settings](#).)

Setting your daily budget to the amount we recommend is optional — you're always in full control of your AdWords account, and you can edit your campaign's daily budget as often as you like.

To learn more about setting your daily budget, visit the [Cost Control](#) lesson.

#### [CPC and CPM Bids](#)

[Back to Top](#)

In keyword-targeted campaigns, you set a cost-per-click (CPC) bid for each ad group or keyword in your campaign. Your CPC bid refers to the amount you're willing to pay for a click on your ad when the ad appears on Google or one of our partner sites.

In placement-targeted campaigns, you choose to make either a CPC bid or a cost-per-thousand impressions (CPM) bid for each ad group or

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placement in your campaign. A CPM bid refers to the amount you're willing to pay each 1000 times your ad appears on one of Google's partner sites. That means you pay when your ad shows, whether or not a user clicks the ad. (Placement targeting is covered in more detail in the [Placement Targeting](#) lesson.)

With both CPC and CPM pricing, you're in control of your bids. Additionally, AdWords helps keep your costs to a bare minimum with the AdWords Discounter and smart pricing. To learn more about these methods, visit the [Cost Control](#) lesson.

#### Quality Score and Minimum Bid

[Back to Top](#)

Quality is the most important factor in determining the cost you'll pay when someone clicks on your keyword-targeted ad. Your Quality Score (which is determined by your keyword's CTR, relevance of ad text, historical keyword performance, and other relevancy factors) sets the minimum bid you'll need to pay in order for your keyword to trigger ads. If your CPC bid is less than the minimum bid assigned to your keyword, you'll need to either raise the CPC to the minimum bid listed or optimize your campaign for quality. For more information on optimization, visit our [Optimization](#) lesson.

It's important to remember that the higher the Quality Score, the lower the minimum bid and cost you'll pay when someone clicks on your ad. Therefore, the best way to drive your advertising costs down for keyword-targeted ads is to maintain high-quality keywords, ads, and campaigns.

[« Previous Topic](#)

[Next Topic »](#)



## AdWords Help Center

Change Language: English (US)

[Google Help](#) > [AdWords Help](#) > [About AdWords](#) > [Starter Edition](#) > [Using Your Starter Edition Account](#)

### How do I write effective Starter Edition text ads?

These five creative tips can turn a bland message into a powerful AdWords ad that really sells. The first two apply to all Starter Edition ads:

- **Include a call to action.** Tell your users directly what you want them to do. Include action terms like *buy*, *shop*, or *browse*. Say *Buy Fresh Red Roses* instead of *Flowers For Sale*.
- **Clearly describe what's unique about your product or service.** What should the user expect to find at your website or at your business location? What can they do there? What can you do for them that no one else can?

The next three apply mainly to Starter Edition text ads. (If you're running [local business ads](#) in your Starter Edition account, these elements are already determined by your business name and location.)

- **Place your business name in your ad text.** Let your users know exactly who you are: give your business name in the text of your ad.
- **Put your most important keyword in the title.** If you're selling flowers and you find that the keyword 'red roses' gets you the most clicks, try putting the term 'red roses' in the title of your ad. Successful keywords are a sign that you're reaching the right audience for your message. (If you're running a local business ad, your business name is already the title of your ad.)
- **If you sell to a precise location, name the location.** Do you deliver flowers in London? The title *Send Red Roses in London* is likely to win you more clicks than just *Send Red Roses*.

Follow these tips and you'll give your ad the best chance for success. Once you've got the big points in place, try polishing your ad with these smaller ideas:

- Capitalize the first letter of each word in your title and your URL. For example: *Buy Fresh Red Roses* instead of *Buy fresh red roses*.
- Avoid gimmicks such as using ALL CAPS, or repeating words or exclamation points (as in *Buy, buy, buy!!!*).
- Avoid generic superlatives such as "The best" or "#1".
- Simplify. Use plain language and short words.

Short form: **Writing an Ad**

Each text ad includes a title, two lines of text, and a

#### Search AdWords Help Center

examples: *content network* or *daily budget*

Search AdWords Help Center

#### Top 5 Questions

1. [How much does AdWords Starter Edition cost?](#)
2. [What should I know about the Keyword Tool's search volume statistics?](#)
3. [How do the Starter Edition and Standard Edition compare?](#)
4. [How does Google Analytics help me?](#)
5. [Now that my Starter Edition ad is running, what essentials should I know?](#)

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[Glossary](#)

#### Learn from other AdWords users

[AdWords Help discussion group.](#)

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display URL indicating the webpage your ad will link to.

Use this ad space to clearly describe your products or services. Highlight special offers, sales, or promotions, and use call-to-action phrases like 'Call today' or 'Shop now' to indicate what users can do once reaching your site.

If you're promoting a specific product, enter your individual webpage URL for that product. (For example: [www.mysite.com/productpage.html](http://www.mysite.com/productpage.html).) Your ad will display the overall site URL ([www.mysite.com](http://www.mysite.com)), but users who click the ad will land on your product page.

[Learn more about writing effective ads.](#)

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**Was this information helpful?**

☐ Yes ☐ No

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**You may also be interested in...**

[How do I choose effective keywords for my Starter Edition ad?](#)

[How can I set a click price limit for the Budget Optimizer in my Starter Edition account?](#)

[How do I edit my ad text in a Starter Edition account?](#)

**Don't see the answer to your question?** Try one of these resources:

[AdWords Discussion Group](#) - Ask questions, share answers, and post your favorite AdWords tips and tricks on Google Groups.

[Learning Center](#) - Build and test your knowledge of AdWords.

[Contact Us](#) - Let one of our AdWords Specialists help.





## AdWords Help Center

Change Language: English (US)

[Google Help](#) > [AdWords Help](#) > [About AdWords](#) > [Signing Up for an Account](#)

### What are the steps to creating an AdWords Starter Edition text ads account?

Use the simple one-page Starter Edition wizard to create your new account and begin running text ads. Here's how to do it:

- Visit the [AdWords home page](#).
- Click the **Sign up now** button.
- Select **Starter Edition** and then click **Continue**.
- **Select your ad location and language.** First, pick the location where you would like your ad to appear. Then select the language in which you want to write your ad. Your ad will appear to users who have selected this as their primary language; please note that Google does not translate your ad.
- **Write your ad.** Enter a headline and two lines of text, along with the URL your ad will link to. Please see our [advertising policies](#) for more information on writing your ad.
- **Choose keywords.** These are the search terms which can trigger the display of your ad.
- **Choose your currency.** This is the currency you will use to pay Google for your AdWords ads. Most people choose their local currency, of course, but you may select any currency you like. This currency affects only how you pay Google; it is unrelated to any currencies you may use for transactions with your customers.
- **Set your monthly budget.** Select one of the preset monthly amounts, or select the box at bottom and enter your own amount.
- Click **Continue**.
- Follow the instructions on the page titled **Do you have a Google Account?** to either enter your existing account information or create a new Google Account. When you are finished, click **Create AdWords Account**.
- You'll see a confirmation page saying that a verification message has been sent to your email address. Your ad will not start running until you have verified your account.
- When the verification email arrives, follow the instructions to enter your billing information, set the time zone for your account, and agree to the AdWords terms and conditions. On the final setup page, click **Save and Activate**.

That's all there is to it. After you complete this process, your ad will start running almost immediately.

To create a Starter Edition local business ads account, please see this [Help Center entry](#),

#### Search AdWords Help Center

examples: *content network* or *daily budget*

Search AdWords Help Center

#### Top 5 Questions

1. [How much does AdWords Starter Edition cost?](#)
2. [What should I know about the Keyword Tool's search volume statistics?](#)
3. [How do the Starter Edition and Standard Edition compare?](#)
4. [How does Google Analytics help me?](#)
5. [Now that my Starter Edition ad is running, what essentials should I know?](#)

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[Glossary](#)

#### Learn from other AdWords users

[AdWords Help discussion group](#).

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**Was this information helpful?**

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☐ Yes ☐ No

**You may also be interested in...**

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[How do I create an AdWords account?](#)

[How is an AdWords account structured?](#)

[Lesson: What is Google AdWords?](#)

**Don't see the answer to your question? Try one of these resources:**

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[AdWords Discussion Group](#) - Ask questions, share answers, and post your favorite AdWords tips and tricks on Google Groups.

[Learning Center](#) - Build and test your knowledge of AdWords.

[Contact Us](#) - Let one of our AdWords Specialists help.

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## EXHIBIT 16

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EXHIBIT 16

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Attorney for Defendants  
DISABILITY GROUP INC.;  
RONALD MILLER

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

HARRY J. BINDER, an individual; and  
CHARLES E. BINDER, an individual,

Plaintiffs,

vs.

DISABILITY GROUP, INC., a corporation;  
RONALD MILLER, an individual; and  
DOES 1 to 10, inclusive,

Defendant.

) Case No.: CV 07-02760-GHK (SSx)

) Hon. George King, Judge  
) Courtroom 650

) DEFENDANT **DISABILITY**  
) **GROUP'S RESPONSE TO FIRST**  
) SET OF REQUEST FOR  
) ADMISSIONS

Defendant Disability Group, Inc. (herein called "**GROUP**"), by and through its attorney Matt Kohn, and for no other defendant, responds to the requests for admissions submitted by the requesting party and for purposes of this action only.

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**Request and Response to No. 1:**

Disability Group, Inc. purchased an internet keyword comprised, in whole or in part, of the BINDER & BINDER TRADEMARKS. As to all requests below, answering party reserves the right to exclude all such evidence during pre-trial proceedings because F.R.C.P. 36. and L.R. 36-1, states "Requests for admissions shall be numbered sequentially without repeating the numbers used on any prior set of requests propounded by that party." This request No. 1 has previously been asked and answered in response to Mr. Miller's request for admission No. 1, and therefore the request is objectionable as both unreasonably burdensome and redundant.

**Request and Response to No. 2:**

Disability Group, Inc. selected an internet keyword comprised, in whole or in part, of the BINDER & BINDER TRADEMARKS. This request No. 2 has previously been asked and answered in response to Mr. Miller's request for admission No. 2, and therefore the request is objectionable as both unreasonably burdensome and redundant.

**Request and Response to No. 3:**

Disability Group, Inc. used the BINDER & BINDER TRADEMARKS in a heading to link to the Defendants' Website. This request No. 3 has previously been asked and answered in response to Mr. Miller's request for admission No. 3, and therefore the request is objectionable as both unreasonably burdensome and redundant.

**Request and Response to No. 4:**

Disability Group, Inc. was aware of the BINDER & BINDER TRADEMARKS prior to March, 2006. **Deny as untrue.**

**Request and Response to No. 5:**

Disability Group, Inc. was aware of Plaintiffs' rights in the BINDER & BINDER TRADEMARKS prior to March, 2006. **Deny as untrue.**

**Request and Response to No. 6:**

The purchase of an internet keyword containing the word "Binder" was at the direction of Ronald Miller. Mr. Miller acts only on behalf of Disability Group, Inc. as its managing director, and not as an individual. If by "at the direction" you mean sole direction, GROUP denies the request as untrue. If by the word "Binder," you mean capitalized "B," GROUP denies the request as untrue; Michael Vincent, who is not a lawyer, concluded, during the course of his deposition, that it was either the managing director of GROUP or GROUP's in-house administrator, whom Mr. Vincent was working with (and, he does not remember the conversation), at whose direction only a keyword common noun lower-case "binder" was purchased.

**Request and Response to No. 7:**

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1 The purchase of an internet keyword containing the BINDER & BINDER TRADEMARKS,  
2 in whole or in part, was at the direction of Ronald Miller. This request No. 7 has previously  
3 been asked and answered in response to Mr. Miller's request for admission No. 6, and therefore the  
request is objectionable as both unreasonably burdensome and redundant.

---

4 **Request and Response to No. 8:**

5 The selection of an internet keyword containing the word "Binder" was at the direction of  
6 Ronald Miller. Mr. Miller acts only on behalf of Disability Group, Inc. as its managing director,  
7 and not as an individual. If by "at the direction" you mean sole direction, GROUP denies the  
8 request as untrue. If by the word "Binder," you mean capitalized "B," GROUP denies the request as  
9 untrue. Michael Vincent, who is not a lawyer, concluded, during the course of his deposition, that it  
10 was either the managing director of GROUP or GROUP's in-house administrator, whom Mr.  
11 Vincent was working with (and, he does not remember the conversation), at whose direction only a  
keyword common noun lower-case "binder" was selected.

---

12 **Request and Response to No. 9:**

13 The selection of an internet keyword containing the BINDER & BINDER TRADEMARKS,  
14 in whole or in part, was at the direction of Ronald Miller. This request No. 9 has previously  
15 been asked and answered in response to Mr. Miller's request for admission No. 7, and therefore the  
request is objectionable as both unreasonably burdensome and redundant.

---

16 **Request and Response to No. 10:**

17 Disability Group, Inc. provides legal services including providing aid in the preparation and  
18 filing of government forms. This request No. 10 has previously been asked and answered in  
19 response to Mr. Miller's request for admission No. 8, and therefore the request is objectionable as  
both unreasonably burdensome and redundant.

---

20 **Request and Response to No. 11:**

21 Disability Group, Inc. is a direct competitor of Binder and Binder. **Admit as true.**

---

22 **Request and Response to No. 12:**

23 The registration notice symbol ® appears in connection with the BINDER &  
24 BINDER TRADEMARKS on Plaintiffs' Website. This request is objectionable as being vague  
25 as to time and date, and therefore can be subject to different meanings. Otherwise, information that  
26 is known and readily obtainable by GROUP is insufficient to enable GROUP to admit or deny the  
27 request, for the reason that the underlying information required for any intelligent response is in the  
sole possession of the opposing party.



**Request and Response to No. 13:**

The registration notice symbol ® appeared in connection with the BINDER & BINDER TRADEMARKS on Plaintiffs' Website prior to March 26, 2006. This request No. 13 has previously been asked and answered in response to Mr. Miller's request for admission No. 10, and therefore the request is objectionable as both unreasonably burdensome and redundant.

**Request and Response to No. 14:**

Disability Group, Inc. viewed Plaintiffs' Website prior to March 26, 2006. **Deny as untrue.**

**Request and Response to No. 15:**

Ronald Miller viewed Plaintiffs' Website prior to March 26, 2006. **Deny as untrue.**

**Request and Response to No. 16:**

Plaintiffs provided constructive notice of the BINDER & BINDER TRADEMARKS under 15 U.S.C. § 1111 prior to March, 2006. This request No. 16 has previously been asked and answered in response to Mr. Miller's request for admission No. 11, and therefore the request is objectionable as both unreasonably burdensome and redundant.

**Request and Response to No. 17:**

Disability Group, Inc. had actual notice of the BINDER & BINDER TRADEMARKS prior to March, 2006. **Deny as untrue.**

**Request and Response to No. 18:**

Disability Group, Inc. had viewed Plaintiffs website prior to March, 2006. **Deny as untrue.**

**Request and Response to No. 19:**

Disability Group, Inc. had seen promotional materials bearing the BINDER & BINDER TRADEMARKS prior to March, 2006. **Deny as untrue.**

**Request and Response to No. 20:**

The text of the Ad appearing in connection with Defendant's website in Exhibit B of the Complaint was drafted by Disability Group, Inc. **Deny as untrue.**

**Request and Response to No. 21:**

The text of the Ad appearing in connection with Defendant's website in Exhibit B of the Complaint was drafted by Ronald Miller. This request No. 21 has previously been asked and answered in response to Mr. Miller's request for admission No. 15, and therefore the request is objectionable as both unreasonably burdensome and redundant.

**Request and Response to No. 22:**

The text of the Ad appearing in connection with Defendant s website in Exhibit B of the Complaint was drafted at the request of Disability Group, Inc. Admit generally; however, the precise words used in the Google Ad text may not have been.

**Request and Response to No. 23:**

The text of the Ad appearing in connection with Defendant s website in Exhibit B of the Complaint was drafted at the request of Ronald Miller. This request No. 23 has previously been asked and answered in response to Mr. Miller's request for admission No. 16, and therefore the request is objectionable as both unreasonably burdensome and redundant.

**Request and Response to No. 24:**

Ronald Miller is the President of Disability Group, Inc. This request No. 24 has previously been asked and answered in response to Mr. Miller's request for admission No. 17, and therefore the request is objectionable as both unreasonably burdensome and redundant.

**Request and Response to No. 25:**

Disability Group, Inc. owns the internet domain name www.socialsecuritydisability411.com. This request No. 25 has previously been asked and answered in response to Mr. Miller's request for admission No. 18; and therefore the request is both unreasonably burdensome and redundant.

**Request and Response to No. 26:**

Ronald Miller has authority over the products and services offered by Disability Group, Inc. This request No. 26 has previously been asked and answered in response to Mr. Miller's request for admission No. 19, and therefore the request is objectionable as both unreasonably burdensome and redundant.

**Request and Response to No. 27:**

Ronald Miller has control over the products and services offered by Disability Group, Inc. This request No. 27 has previously been asked and answered in response to Mr. Miller's request for admission No. 20, and therefore the request is objectionable as both unreasonably burdensome and redundant.

**Request and Response to No. 28:**

Plaintiffs have not given Disability Group, Inc. permission to utilize the BINDER & BINDER TRADEMARKS. This request No. 28 has previously been asked and answered in



1 response to Mr. Miller's request for admission No. 21, and therefore the request is objectionable as  
2 both unreasonably burdensome and redundant.

---

3 **Request and Response to No. 29:**

4 Plaintiffs have not given Ronald Miller permission to utilize the BINDER & BINDER  
5 TRADEMARKS. This request No. 29 has previously been asked and answered in response to Mr.  
6 Miller's request for admission No. 22, and therefore the request is objectionable as both  
unreasonably burdensome and redundant.

---

8 **Request and Response to No. 30:**

9 Plaintiffs have not given Disability Group, Inc. a license to utilize the BINDER & BINDER  
10 TRADEMARKS. This request No. 30 has previously been asked and answered in response to Mr.  
11 Miller's request for admission No. 24; and therefore the request is objectionable as both  
unreasonably burdensome and redundant.

---

12 **Request and Response to No. 31:**

13 Plaintiffs have not given Ronald Miller a license to utilize the BINDER & BINDER  
14 TRADEMARKS. This request No. 31 has previously been asked and answered in response to Mr.  
15 Miller's request for admission No. 23, and therefore the request is objectionable as both  
unreasonably burdensome and redundant.

---

17 **Request and Response to No. 32:**

18 The link to the Defendant s website in Exhibit B of the Complaint appears higher on the  
19 page than the link to Plaintiffs website. This request No. 32 has previously been asked and  
20 answered in response to Mr. Miller's request for admission No. 25, and therefore the request is  
objectionable as both unreasonably burdensome and redundant.

---

21 **Request and Response to No. 33:**

22 Disability Group, Inc. does not advertise for BINDER & BINDER. This request No. 33 has  
23 previously been asked and answered in response to Mr. Miller's request for admission No. 26, and  
24 therefore the request is objectionable as both unreasonably burdensome and redundant.

---

25 **Request and Response to No. 34:**

26 Disability Group Inc. has retained clients that have clicked the link to Defendant s website  
27 containing the BINDER & BINDER TRADEMARKS in Exhibit B of the Complaint. This  
28 request No. 34 has previously been asked and answered in response to Mr. Miller's request for

admission No. 27, and therefore the request is objectionable as both unreasonably burdensome and redundant.

---

**Request and Response to No. 35:**

Ronald Miller uses the e-mail address winningcases@aol.com. This request No. 35 has previously been asked and answered in response to Mr. Miller's request for admission No. 28, and therefore the request is objectionable as both unreasonably burdensome and redundant.

---

**Request and Response to No. 36:**

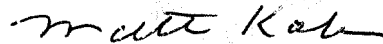
Binder and Binder does not refer clients to Disability Group, Inc. This request No. 36 has previously been asked and answered in response to Mr. Miller's request for admission No. 30, and therefore the request is objectionable as both unreasonably burdensome and redundant.

---

**Request and Response to No. 37:**

Binder and Binder does not refer clients to Ronald Miller. This request No. 37 has previously been asked and answered in response to Mr. Miller's request for admission No. 29, and therefore the request is objectionable as both unreasonably unreasonably burdensome and redundant.

Dated: November 5, 2007



Matt Kohn, of Counsel

Disability Group, Inc.

PROOF OF SERVICE BY MAIL

I, the undersigned, say: I am and was at all times herein mention, a citizen of the United States and a resident of the County of Los Angeles, over the age of eighteen years and not a party to the within action or proceeding; that my business address is 844 25<sup>th</sup> Street, Santa Monica, California 90403.

On November 5, 2007, I served the within,

**RESPONSES TO PLAINTIFFS' DISCOVERY:**

**Interrogatories to Ronald Miller; Interrogatories to Disability Group; Requests for Admission to Ronal Miller; Request for Admission to Disability Group.**

by:

- ( ) personal delivery to persons listed below;
- ( ) E-MAIL to the persons listed below, true original thereof, to the following e-mail addresses, as an attached "Microsoft Word" file, originating from my hard drive (computer), knowing in advance that each such individual has the capability of retrieving said document in full, and the transmission was reported as completed without return or error;
- ( **X** ) depositing true copies thereof enclosed in a sealed envelope with postage prepaid, in the United States mail at Los Angeles, California, addressed as follows:

Kenneth G. Parker  
TEUTON, LOEWY & PARKER  
3121 Michelson Drive, Suite 250  
Irvine, California 92612

Telephone: 949 - 442 - 7100  
[kparker@tlpfirm.com](mailto:kparker@tlpfirm.com)

I declare I am a member of the bar and that the foregoing is true and correct and was executed by me this 5 day of NOV., 2007, in Santa Monica, California.

*Matt Kohn*

Matt Kohn (Original signed)

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## EXHIBIT 17

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000510

EXHIBIT 17

Patricia (Pati) Limon

From: Mike Vincent [mike.vincent@axsen.com]  
Sent: Tuesday, May 08, 2007 8:31 PM  
To: Ron Miller  
Subject: 168166 - A Disability Group, Inc.: Binder and Binder Reports



Binder 1-1-00 Binder 1-1-00 Binder 11-3-06 Binder 11-3-06 Binder 3-26-06 Binder 3-26-06  
, 3-25-06 Results 3-25-06 Search 5-7-07 Results 5-7-07 Search 11-2-06 Results 11-2-06 Search

Hi Ron,

Please see attached "search" and a "results" docs for before, during and after the Disability Group's Google PPC campaign included the keyword "binder and binder". Note: this is the only keyword that includes the word "binder" in any combination. These screen shots were taken by me today using Google's report tool from data within your campaign. We can recreate these reports for you as long as Google maintains their data.

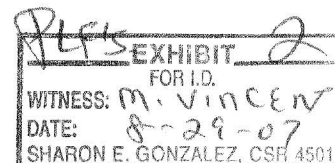
- 1) Before (1/1/00 - 3/25/06) = 0 clicks / \$0.00 cost
- 2) During (3/26/06 - 11/2/06) = 2,952 clicks / \$1,226.41 cost
- 3) After (11/3/06 - 5/7/07) = 0 clicks / \$0.00 cost

I checked, and you are correct. We have a billing record showing the call from you and the action of removing "binder and binder" as a keyword on 11/2/2006.

Best Regards,

Mike Vincent  
Axsen - Legal Web Design  
mike.vincent@axsen.com

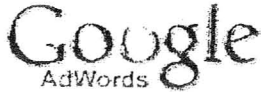
dg-195



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REQUIRED INITIAL DISCLOSURES (made without prejudice) PER FB 606P 126(a)(1)

2



168166 - Disability Group LLP ( Client ID: 167-014-0399 )  
My Client Center | 168166 - Disability Group LLP

mike.vincent@gmail.com | 2  
New Features! | Help | Contact  
Us | Sign Out  
Manager ID: 870-712-9058

Campaign Management

**Reports**

Analytics

My Account

Report Center | Create Report

✓ Your report request was submitted successfully. We estimate your report will take up to 15 minutes to complete.

## Report: Binder Keyword Report

Report requested May 8, 2007 6:33:59 PM

Your report is in progress.

You can safely leave this page now, and view or download your report at the [Report Center](#) when the report is completed.

Or, simply wait here until the report completes. This page will refresh automatically every few seconds until your report is ready. [Click here](#) to refresh the page manually.

### Report Details

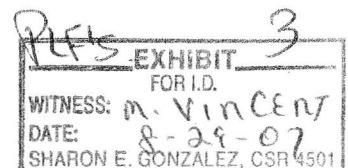
Report type: Keyword  
Date range: Jan 1, 2000 - Mar 25, 2006  
View: Summary  
Campaigns: All  
Ad Groups: All  
Ad statuses: All  
Keywords: binder and binder  
Ad Distribution: All  
Keyword matching: All  
Scheduled: No  
Email notification: Off

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Time zone for all dates and times in data tables, reports, and billing: (GMT-08:00) Pacific Time. [Learn more.](#)

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REQUIRED INITIAL DISCLOSURES (made without prejudice) PER FRCP 26(a)(1)  
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3



Google™ Binder Keyword Report | Jan 1, 2000 - Mar 25, 2006 - (GMT-08:00) Pacific Time

Close Report

CAMPAIGNS: All | KEYWORDS: binder and binder | ADWORDS TYPE: All

Download report as: .csv (for excel), .csv, .tsv, .xml [?]

Showing rows 1 - 0 of 0.

Campaign	Ad Group	Keyword	Keyword Status	Clicks	Avg CPC	Cost
Totals and Overall Averages:				0	\$0.00	\$0.00

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REQUIRED INITIAL DISCLOSURES (made without prejudice) PER FRCP 26(a)(1)

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000513



168166 - Disability Group LLP ( Client ID: 167-014-0399 )  
My Client Center | 168166 - Disability Group LLP

mike.vincent@gmail.com | 2  
New Features! | Help | Contact  
Us | Sign Out  
Manager ID: 870-712-9058

Campaign Management

**Reports**

Analytics

My Account

Report Center | Create Report

✓ Your report request was submitted successfully. We estimate your report will take up to 15 minutes to complete.

## Report: Binder Keyword Report

Report requested May 8, 2007 6:31:23 PM

✓ Your report is in progress.

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Or, simply wait here until the report completes. This page will refresh automatically every few seconds until your report is ready. [Click here](#) to refresh the page manually.

### Report Details

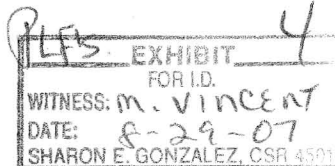
Report type:	Keyword
Date range:	Mar 26, 2006 - Nov 2, 2006
View:	Summary
Campaigns:	All
Ad Groups:	All
Ad statuses:	All
Keywords:	binder and binder
Ad Distribution:	All
Keyword matching:	All
Scheduled:	No
Email notification:	Off

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000514  
4



Google™ Binder Keyword Report | Mar 26, 2006 - Nov 2, 2006 - (GMT-08:00) Pacific Time

Close Report

CAMPAIGNS: All | KEYWORDS: binder and binder | ADWORDS TYPE: All

Download report as: .csv (for excel), .csv, .tsv, .xml [?]

Showing rows 1 - 2 of 2.

Campaign ▼	Ad Group	Keyword	Keyword Status	Clicks	Avg CPC	Cost
National Ads	USA - Main + Ailments	binder and binder	Deleted	2,952	\$0.42	\$1,226.41
National Ads	Custom: "Social Security Lawyer"	binder and binder	Deleted	0	\$0.00	\$0.00
Totals and Overall Averages:				2,952	\$0.42	\$1,226.41

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REQUIRED INITIAL DISCLOSURES (made without prejudice) PER FRCP 26(a)(1)

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168166 - Disability Group LLP ( Client ID: 167-014-0399 )  
My Client Center | 168166 - Disability Group LLP

mike.vincent@gmail.com | 2  
New Features! | Help | Contact  
Us | Sign Out  
Manager ID: 870-712-9058

Campaign Management

**Reports**

Analytics

My Account

Report Center | Create Report

✓ Your report request was submitted successfully. We estimate your report will take up to 15 minutes to complete.

## Report: Binder Keyword Report

Report requested May 8, 2007 6:35:27 PM

✓ Your report is in progress.

You can safely leave this page now, and view or download your report at the [Report Center](#) when the report is completed.

Or, simply wait here until the report completes. This page will refresh automatically every few seconds until your report is ready. [Click here](#) to refresh the page manually.

### Report Details

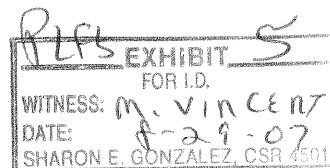
Report type:	Keyword
Date range:	Nov 3, 2006 - May 7, 2007
View:	Summary
Campaigns:	All
Ad Groups:	All
Ad statuses:	All
Keywords:	binder and binder
Ad Distribution:	All
Keyword matching:	All
Scheduled:	No
Email notification:	Off

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433  
XXXXX

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#2001

Google™ Binder Keyword Report [Nov 3, 2006 - May 7, 2007] - (GMT-08:00) Pacific Time

CAMPAIGNS: All | KEYWORDS: binder and binder | ADWORDS TYPE: All

Close Report

Download report as: [csv \(for excel\)](#), [.csv](#), [.tsv](#), [.xml](#) [?]

Showing rows 1 - 0 of 0.

Campaign	Ad Group	Keyword	Keyword Status	Clicks	Avg CPC	Cost
Totals and Overall Averages:				0	\$0.00	\$0.00

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